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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

V.

JOSE MANUEL CHAVEZ ZEPEDA, and  
DENIS ZACARIAS PONCE CASTILLO

### Defendants.

CASE NO. 2:22-cr-00064-JAM

**STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER**

DATE: February 11, 2025

TIME: 9:30 a.m.

COURT: Hon. John A. Mendez

## STIPULATION

1. By previous order, this matter was set for status on February 11, 2025.

2. By this stipulation, defendants now move to continue the status conference until **April 25, at 09:00 a.m.**, and to exclude time between February 11, 2025, and April 08, 2025, under Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes more than 5,300 pages of investigative reports, photographs, phone toll records, and materials, as well as video and audio recordings. All of this discovery has been either provided directly to counsel and/or made available for inspection and copying.

1                   b)     On August 29, 2024, attorney Shari Rusk was appointed as new counsel of record  
2 for defendant Denis Zacarias Ponce Castillo.

3                   c)     On October 4, 2024, the Court signed an order substituting N. Allen Sawyer as  
4 new counsel for defendant Jose Manuel Chavez Zepeda.

5                   d)     Counsel for defendants desire additional time to review the discovery, to review  
6 the charges and potential responses to the charges with their clients, to conduct factual  
7 investigation and legal research, and to otherwise prepare for trial.

8                   e)     Counsel for defendants believe that failure to grant the above-requested  
9 continuance would deny them the reasonable time necessary for effective preparation, taking into  
10 account the exercise of due diligence.

11                  f)     The government does not object to the continuance.

12                  g)     Based on the above-stated findings, the ends of justice served by continuing the  
13 case as requested outweigh the interest of the public and the defendant in a trial within the  
14 original date prescribed by the Speedy Trial Act.

15                  h)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
16 et seq., within which trial must commence, the time period of February 11, 2025 to April 08,  
17 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
18 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
19 of the Court's finding that the ends of justice served by taking such action outweigh the best  
20 interest of the public and the defendant in a speedy trial.

21                  4.     Nothing in this stipulation and order shall preclude a finding that other provisions of the  
22 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
23 must commence.

24                  IT IS SO STIPULATED.

Dated: February 4, 2025

MICHELE BECKWITH  
Acting United States Attorney

/s/ DAVID W. SPENCER

DAVID W. SPENCER  
Assistant United States Attorney

Dated: February 4, 2025

/s/ N. Allen Sawyer

N. Allen Sawyer  
Counsel for Defendant  
JOSE MANUEL CHAVEZ ZEPEDA

Dated: February 4, 2025

/s/ Shari Rusk

Shari Rusk  
Counsel for Defendant  
DENIS ZACARIAS PONCE  
CASTILLO

**ORDER**

IT IS SO ORDERED.

Dated: February 04, 2025

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE